

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff

v.

MEELAD DEZFOOLI,

Defendant

Case No. 2:22-cr-00142-CDS-DJA

**Order Granting United States of
America's Motion to Prevent the Sale of
176 Glen Falls Avenue, Henderson,
Nevada 89002**

[ECF No. 231]

The United States moves this Court to issue an Order to prevent the Clark County Treasurer from pursuing a tax sale and to prevent Paradise Hills Landscape Maintenance Association, Inc. (Paradise Hills HOA) from proceeding with a HOA default foreclosure sale on 176 Glen Falls Avenue, Henderson, Nevada 89002 (176 Glen Falls).¹ 21 U.S.C. § 853(k) prohibits the Treasurer and Paradise Hills HOA from selling the property

¹ 176 Glen Falls Avenue, Henderson, Nevada 89002, more particularly described as: LOT 17 IN BLOCK "C" OF PARADISE HILLS NO. 16, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 97 OF PLATS, PAGE 8, IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA. EXCEPTING THEREFROM ALL MINERALS, OIL, GAS PETROLEUM, OTHER HYDROCARBON SUBSTANCES AND ALL GEOTHERMAL ENERGY SOURCES IN OR UNDER OR WHICH MAY BE PRODUCED FROM THE WITHIN-DESCRIBED LAND WHICH LIE BELOW A PLANE PARALLEL TO AND FIVE HUNDRED (500) FEET BELOW THE SURFACE OF THE WITHIN-DESCRIBED LAND, FOR THE PURPOSE OF PROSPECTING, EXPLORATION, DEVELOPMENT, PRODUCTION, OR EXTRACTION OF SAID SUBSTANCES BY MEANS OF MINES, WELLS, DERRICKS, AND/OR OTHER EQUIPMENT; PROVIDED, HOWEVER, THAT THE OWNER OF SAID SUBSTANCES SHALL HAVE NO RIGHT TO ENTER THE SURFACE OF THE WITHIN-DESCRIBED LAND NOR TO USE SAID LAND ABOVE SAID PLANE PARALLEL TO AND FIVE HUNDRED (500) FEET BELOW THE SURFACE OF SUCH LAND; TOGETHER WITH ALL IMPROVEMENTS AND APPURTENANCES THEREON, APN: 179-31-212-022.

1 because 176 Glen Falls is subject to forfeiture in the Criminal Superseding Indictment. The
 2 United States has authority to protect its forfeiture interest in 176 Glen Falls under 21
 3 U.S.C. § 853(c) and 853(e)(1)(A). Accordingly, this Court should grant this Motion and
 4 issue the Order.

5 This Motion is made and is based on the following Memorandum of Points and
 6 Authorities, the pleadings and papers on file, and the attached Exhibits.²

7 MEMORANDUM OF POINTS AND AUTHORITIES

8 I. STATEMENT OF FACTS

9 The United States adopts and incorporates the facts stated in the Superseding
 10 Criminal Indictment.³

11 Beginning on or around April 2020 and continuing until at least on or around March
 12 2021, Meelad Dezfooli knowingly executed, and attempted to execute, a scheme to defraud
 13 and artifice to obtain money and property owned by, and under the custody and control of,
 14 financial institutions by means of materially false and fraudulent pretenses, representations,
 15 and promises. Dezfooli submitted fraudulent PPP loan applications and obtained
 16 approximately \$11.2 million to unjustly enrich himself and others.⁴

17 On or around March 24, 2021, Dezfooli purchased 176 Glen Falls at public auction
 18 for \$452,000 under the name of Sanam Limited, an entity formed by Dezfooli to further his
 19 scheme of fraudulent PPP loan applications.⁵ Dezfooli identified himself as the sole owner
 20 of Sanam Limited.⁶

21 On June 22, 2022, a Grand Jury returned an Eight-Count Criminal Indictment
 22 charging Dezfooli with bank fraud, concealment money laundering, and monetary
 23 transactions in criminally derived property.⁷ On December 12, 2023, a Ten-Count
 24 Superseding Criminal Indictment was returned charging Dezfooli with three counts of bank

25 ² All Exhibits are attached hereto and incorporated herein by reference as if fully set forth
 26 herein.

27 ³ LR IA 10-3(a); Superseding Criminal Indictment (SCI), ECF No. 97.

28 ⁴ SCI, ECF No. 97.

⁵ SCI, ECF No. 97; Exhibit (Ex.) 14-1 Trustee's Deed Upon Sale for 176 Glen Falls
 Avenue, Henderson, Nevada 89002.

⁶ SCI, ECF No. 97, p. 2.

⁷ Criminal Indictment, ECF No. 1; Minutes of Proceedings, ECF No. 3.

1 fraud in violation of 18 U.S.C. § 1344(2), three counts of concealment money laundering in
 2 violation of 18 U.S.C. § 1956(a)(1)(B)(i), and four counts of monetary transactions in
 3 criminally derived property in violation of 18 U.S.C. § 1957.⁸ At his arraignment, Dezfooli
 4 plead not guilty to all ten Counts.⁹ A jury trial commenced on August 26, 2024.¹⁰

5 In the Superseding Criminal Indictment, forfeiture is alleged under 18 U.S.C.
 6 § 981(a)(1)(A) with 28 U.S.C. § 2461(c); 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c);
 7 and 18 U.S.C. § 982(a)(1) and 982(a)(2)(A) and identified 176 Glen Falls, four other real
 8 properties, a 2021 Tesla, and a 2021 Bentley as forfeitable property, and criminal forfeiture
 9 money judgments of at least \$11,231,186.52, \$2,303,872.56, and \$965,276.11.¹¹

10 On July 12, 2022, the United States filed Notices of Lis Pendens with this Court for
 11 all five real properties subject to forfeiture as identified in the Superseding Criminal
 12 Indictment: 176 Glen Falls;¹² 6116 Chinook Way, Las Vegas, Nevada, 89108;¹³ 6033
 13 Watermelon Street, Las Vegas, Nevada, 89081;¹⁴ 1829 La Calera Avenue, North Las Vegas,
 14 Nevada, 89084;¹⁵ and 890 Harbor Avenue, Henderson, Nevada 89002.¹⁶ On the same day,
 15 the United States recorded the certified copies of each Lis Pendens for all five real
 16 properties, including 176 Glen Falls.¹⁷

17 On December 1, 2022, the United States recorded a Request for Notice Under
 18 Chapter 107 NRS with the Clark County Recorder, requesting a copy of any Notice of
 19 Default or Notice of Sale regarding 176 Glen Falls.¹⁸

20 Despite the fact the United States recorded a Lis Pendens and a Request for Notice
 21 for 176 Glen Falls, a records search from the Clark County Recorder's website reveals that
 22 the Clark County Treasurer took action against the United States' interest when it recorded
 23

24 ⁸ SCI, ECF No. 97.

25 ⁹ Court Minutes - Arraignment & Plea, ECF No. 104.

26 ¹⁰ Minutes of Proceeding, ECF No. 216.

27 ¹¹ SCI, ECF No. 97, p. 16-21.

28 ¹² Lis Pendens, ECF No. 12.

¹³ Lis Pendens, ECF No. 8.

¹⁴ Lis Pendens, ECF No. 9.

¹⁵ Lis Pendens, ECF No. 10.

¹⁶ Lis Pendens, ECF No. 11.

¹⁷ Ex. A, Recorded Certified Copy of Lis Pendens for 176 Glen Falls.

¹⁸ Ex. B, Recorded Request for Notice for 176 Glen Falls.

1 a Tax Certificate for Delinquent Taxes on January 3, 2023.¹⁹ A property inquiry of 176 Glen
 2 Falls from the Clark County Treasurer's website reveals that taxes have not been paid since
 3 March 2021 and unpaid taxes, interest, penalties, and fees have accrued to \$17,359.84 as of
 4 August 20, 2024.²⁰ The unpaid taxes and its fees continue to accumulate against the
 5 property and are decreasing the value of 176 Glen Falls.

6 On July 22, 2024, the United States Attorney's Office received a cover letter from
 7 Red Rock Financial Services with a copy of the Notice of Default and Election to Sell 176
 8 Glen Falls issued by Paradise Hills HOA.²¹ According to the Notice, "no sale date may be
 9 set until the ninety-first (91st) day after the recorded date and the mailing date of the Notice
 10 of Default and Election to Sell." The Notice of Default was recorded on July 15, 2024,
 11 which results in a possible HOA default sale date of October 14, 2024. An amount of
 12 \$2,903.96 is owed for unpaid HOA fees as of July 9, 2024, excluding additional accruing
 13 assessments, interests, costs, and fees.²²

14 Despite the fact the United States recorded a Lis Pendens in July 2022, Paradise
 15 Hills HOA still attempted to act against the United States' interest in 176 Glen Falls when
 16 it issued its Notice of Default and Election to Sell in July 2024.

17 Besides the unpaid taxes and the HOA default, additional liens have been placed
 18 against the property that further reduces the property's value.²³ The United States was
 19 recently made aware that tenants could possibly be residing on the property which increases
 20 risks and liability and further decreasing its value.

21 The Clark County Treasurer and Paradise Hills HOA are precluded from taking any
 22 further action against the United States' interest in 176 Glen Falls under 21 U.S.C.
 23 § 853(k).

24 / / /

25 / / /

26

27 ¹⁹ Ex. C, Clark County Recorder Property Search for 176 Glen Falls.

28 ²⁰ Ex. D, Clark County Treasurer, Property Account Inquiry for 176 Glen Falls.

²¹ Ex. E, Notice of Default and Election to Sell 176 Glen Falls.

²² *Id.*

²³ Ex. C.

II. ARGUMENT

A. This Court Has Authority to Prevent the County Treasurer from Advancing with a Tax Sale and Paradise Hills HOA from Proceeding with a Default Foreclosure Sale under 21 U.S.C. § 853(k).

The United States recorded a Lis Pendens for 176 Glen Falls on July 12, 2022, notifying the world, including the Treasurer and Paradise Hills HOA, that the government was litigating the real property in a criminal action. When the grand jury returns a criminal indictment, the government is authorized to forfeit any of the defendant's property, "which constitutes or is derived from proceeds traceable to [the crime], or a conspiracy to commit such offense[;]"²⁴ "constituting, or derived from, proceeds... obtained directly or indirectly, as the result of" the crime, "or a conspiracy to violate" such offense, "affecting a financial institution[;]"²⁵ "involved in a transaction or attempted transaction in violation of [the crime], or any property traceable to such property[;]"²⁶ or "involved in [the crime], or any property traceable to such property."²⁷

To prevent third parties claiming an interest in forfeitable property from interfering with the orderly conduct of criminal cases, Congress prohibits third parties from commencing actions against the interest of the United States in forfeitable property after an indictment has been filed.

Except as provided in subsection (n), no party claiming an interest in property subject to forfeiture under this section may - -

...
(2) commence an action at law or equity against the United States concerning the validity of his alleged interest in the property subsequent to the filing of an indictment or information alleging that the property is subject to forfeiture under this section.²⁸

In *MacInnes*, the Ninth Circuit expressly held a foreclosure sale is "an action at law or equity against the United States in contravention of § 853(k)."²⁹ Under 21 U.S.C.

²⁴ 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c) (brackets added).

²⁵ 18 U.S.C. § 982(a)(2)(A) (brackets and ellipsis added).

²⁶ 18 U.S.C. § 981(a)(1)(A) with 28 U.S.C. § 2461(c) (brackets added).

²⁷ 18 U.S.C. § 982(a)(1).

²⁸ 21 U.S.C. § 853(k)(2) (ellipses added).

²⁹ *United States v. MacInnes*, 223 F. App'x 549, 550, 553-54 (9th Cir. 2007) (per curiam) (citing *United States v. Phillips*, 185 F.3d 183, 187-88 (4th Cir. 1999) (holding "the foreclosure action constituted 'an action at law or equity against the United States' and was statutorily barred under § 853(k)" quoting 21 U.S.C. § 853(k)); *United States v. Lazarenko*, 476 F.3d 642,

§ 853(c), (k), and (n), advancing with a tax sale or any other proceeding against the United States' interest in 176 Glen Falls, a forfeitable property, is an action against the United States, outside the confines of the exclusive ancillary procedure of § 853(n) and Fed. R. Crim. P. 32.2(c), and is, therefore, barred.³⁰

"Section 853(n) provides the process for vindicating a third party's interests in forfeited property. The law appears settled that an ancillary proceeding constitutes the only avenue for a third party claiming an interest in seized property."³¹ When a property is forfeitable in a criminal indictment, third parties are prohibited from foreclosing on that property.³² A third party's only recourse is to petition the Court in the process identified in § 853(n) and Fed. R. Crim. P. 32.2(c).³³

Although the United States took appropriate measures to provide notice of its judicial interests in 176 Glen Falls prior to the Treasurer's Tax Certificate and prior to Paradise Hills HOA's Notice of Default, the HOA could commence with a default foreclosure around October 2024, and the Treasurer could proceed with a tax sale around January 2025. However, 21 U.S.C. § 853(k)(2) prevents them from taking further action since 176 Glen Falls is identified as forfeitable property in the superseding criminal indictment. The Treasurer, Paradise Hills HOA, and potential third parties, who may have

648 (9th Cir. 2007) (explaining third party cannot bring an action at law or equity) (citing 21 U.S.C. § 853(k)).

³⁰ See *Libretti v. United States*, 516 U.S. 29, 44 (1995) (When the government has forfeited property, third-party petitioners may "establish their entitlement to a return of the assets only by means of a hearing afforded under 21 U.S.C. § 853(n)."); *Lazarenko*, 476 F.3d at 646-48, 650, 652; *Phillips*, 185 F.3d at 187-88.

³¹ *Lazarenko*, 476 F.3d at 648 (explaining "a court adjudicates a third party's interest in the forfeited property in an ancillary proceeding after concluding the criminal case and entering a preliminary order of forfeiture."); Fed. R. Crim. P. 32.2(b) advisory committee's note (bracket added) ("[T]hird party interests in a criminally forfeited property are litigated by the court in the ancillary proceeding following the conclusion of the criminal case and the entry of a preliminary order of forfeiture."); 21 U.S.C. § 853(n); 18 U.S.C. § 1963(l).

³² *MacInnes*, 223 F. App'x at 550, 553-54.

³³ See *Id.*; *Libretti*, 516 U.S. at 44 (When the government has forfeited property, third-party petitioners may "establish their entitlement to a return of the assets only by means of a hearing afforded under 21 U.S.C. § 853(n)."); Fed. R. Crim. P. 32.2(b) advisory committee's note (brackets added) ("[T]hird party interests in a criminally forfeited property are litigated by the court in the ancillary proceeding following the conclusion of the criminal case and the entry of a preliminary order of forfeiture."); 21 U.S.C. § 853(n); 18 U.S.C. § 1963(l); Fed. R. Crim. P. 32.2(c).

an interest in the property, are statutorily barred from selling the property.³⁴ Their only recourse is 21 U.S.C. § 853(n) and Fed. R. Crim. P. 32.2(c).³⁵

B. The United States Has Authority to Protect its Forfeiture Interest in 176 Glen Falls under 21 U.S.C. § 853(c) and 853(e)(1)(A).

The United States has authority to seek the preservation of property for forfeiture. Under 21 U.S.C. § 853(c), the property “vests in the United States upon the commission of the act giving rise to [the] forfeiture....”³⁶ Under 21 U.S.C. § 853(e)(1)(A), “the court may...take any... action to preserve the availability of property... upon the filing of an indictment... charging a violation... for which criminal forfeiture may be ordered....”³⁷

In *92 Buena Vista*, the Supreme Court determined that the “relation back” doctrine in 21 U.S.C. § 853(c) does not self-execute and the government does not become an owner until after forfeiture is decreed and title is retroactively vested.³⁸ Because the United States’ interest in the property is not perfected until after forfeiture is decreed, the United States does not have a right to prematurely cut off the interests of potential third-parties.

The Clark County Treasurer and Paradise Hills HOA may have an interest in the property, and the United States does not seek to bypass those interests. The United States requests this Court to prevent the Treasurer and Paradise Hills HOA from selling the property, resulting in eliminating any potential recovery of forfeiture proceeds. The United States has alleged that 176 Glen Falls was purchased with illegal proceeds.³⁹ Once forfeiture is completed the property title will vest in the United States, but only if the property is still available. “The Government’s interest in winning undiminished forfeiture thus includes the

³⁴ *MacInnes*, 223 F. App’x at 550, 553-54.

³⁵ *See; Phillips*, 185 F.3d at 187-88; *In re America Basketball League, Inc.*, 317 B.R. 121, 129 (Bankr. N.D. Cal. 2004) (“Consistent with the plain language of the statute, the case law has uniformly found that § 853(k) imposes an absolute bar to actions that assert an interest in forfeitable property if they are commenced outside of the ancillary proceedings.”); *Libretti*, 516 U.S. at 44; *Lazarenko*, 476 F.3d at 646-48; 650, 652.

³⁶ 21 U.S.C. § 853(c) (brackets added).

³⁷ 21 U.S.C. § 853(e)(1)(A) (ellipses added).

³⁸ *United States v. 92 Buena Vista Ave.*, 507 U.S. 111, 125-26 (1993). *Buena Vista* is discussing 21 U.S.C. § 881(h), which has similar vesting language to 21 U.S.C. § 853(c).

³⁹ *See* SCI, ECF No. 97.

objective of returning property, in full, to those wrongfully deprived or defrauded of it.”⁴⁰
 The Treasurer and Paradise Hills HOA will have an opportunity to assert their interests in
 the property during the ancillary proceeding.⁴¹

Under 21 U.S.C. § 853(e), the Court has the discretion to issue protective orders at
 the request of the government.⁴² “Whatever discretion Congress gave the district courts in
 § 853(e) and 853(c), that discretion must be cabined by the purposes for which Congress
 created it: to preserve the availability of property for forfeiture.”⁴³

This Court is authorized to prevent the Treasurer and Paradise Hills HOA from
 proceeding with a sale of the property to preserve the United States’ interests and rights to
 the property.

III. CONCLUSION

For the foregoing reasons, this Court should enter an Order prohibiting the Clark
 County Treasurer with a tax sale and prohibiting Paradise Hills HOA from a default
 foreclosure sale of 176 Glen Falls Avenue, Henderson, Nevada 89002.

Dated: August 28, 2024.

JASON M. FRIERSON
 United States Attorney
/s/ Daniel D. Hollingsworth
 DANIEL D. HOLLINGSWORTH
 Assistant United States Attorney

IT IS SO ORDERED:


 CRISTINA D. SILVA
 UNITED STATES DISTRICT JUDGE

Dated: September 10, 2024

⁴⁰ *Caplin & Drysdale v. United States*, 491 U.S. 617, 629 (1989); *United States v. Lillard*, 57 F.4th 729, 734-36 (9th Cir. 2023).

⁴¹ Fed. R. Crim. P. 32.2(c); 21 U.S.C. § 853(n); *Libretti*, 516 U.S. at 44 (When the government has forfeited property, third-party petitioners may “establish their entitlement to a return of the assets only by means of a hearing afforded under 21 U.S.C. § 853(n).”); *United States v. Hooper*, 228 F.3d 818, 821 (9th Cir. 2000) (After the government forfeits property, third parties may assert a third-party petition with the court to litigate their interests.);

⁴² *United States v. Crozier*, 777 F.2d 1376, 1382 (9th Cir. 1985).

⁴³ *United States v. Monsanto*, 491 U.S. 600, 613 (1989) (quotation marks and ellipsis omitted); see *United States v. 849 NW Wall Street, Bend, Oregon*, co7-359Z, 2008 U.S. Dist. Lexis 104313, 6-7 (W.D. Wash. December 17, 2008).

UNITED STATES OF AMERICA,
Plaintiff,
v.
MEELAD DEZFOOLI,
Defendant.

Index of Exhibits

Exhibit 14-1	Trustee's Deed Upon Sale for 176 Glen Falls Ave.
Exhibit A	Recorded Lis Pendens for 176 Glen Falls Ave.
Exhibit B	Recorded Request for Notice for 176 Glen Falls Ave.
Exhibit C	Clark County Recorder, Property Search for 176 Glen Falls Ave.
Exhibit D	Clark County Treasurer, Property Account Inquiry for 176 Glen Falls Ave.
Exhibit E	Paradise Hills HOA Notice of Default and Election to Sell 176 Glen Falls Ave.

Exhibit 14-1 – Trustee’s Deed Upon Sale for 176 Glen Falls Ave.

Exhibit 14-1 – Trustee’s Deed Upon Sale for 176 Glen Falls Ave.

Inst #: 20211008-0000039

Fees: \$42.00

RPTT: \$2305.20 Ex #:

10/08/2021 07:01:27 AM

Receipt #: 4730510

Requestor:

Law office of Andrew H Pa

Recorded By: BGN Pgs: 3

Debbie Conway

CLARK COUNTY RECORDER

Src: ERECORD

Ofc: ERECORD

A.P.N.: 179-31-212-022

RECORDING REQUESTED BY:
CLEAR RECON CORP

AND WHEN RECORDED TO:

Sanam Limited
34 Sandwedge Dr
Henderson, NV 89074

Forward Tax Statements to
the address given above

SPACE ABOVE LINE FOR RECORDER'S USE

T.S. # 090044-NV Loan #: *****0514

Order #: 191315360-NV-VOL

The undersigned hereby affirms that there is no Social Security number contained in this document.

TRUSTEE'S DEED UPON SALE

Transfer Tax: \$2,305.20

The Grantee Herein was not the Foreclosing Beneficiary.

The Amount of the Unpaid Debt was \$505,499.81

The Amount Paid by the Grantee was \$452,000.00

Said Property is in the City of HENDERSON, County of Clark

CLEAR RECON CORP, as Trustee, (whereas so designated in the Deed of Trust hereunder more particularly described or as duly appointed Trustee) does hereby GRANT and CONVEY to

Sanam Limited with the address of Sanam Limited, 34 Sandwedge Dr, Henderson, NV 89074

(herein called Grantee) but without covenant or warranty, expressed or implied, all rights, title and interest conveyed to and now held by it as Trustee under the Deed of Trust in and to the property situated in the county of Clark, State of Nevada, described as follows:

LOT 17 IN BLOCK "C" OF PARADISE HILLS NO. 16, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 97 OF PLATS, PAGE 8 IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA, EXCEPTING THEREFROM ALL MINERALS, OIL, GAS, PETROLEUM, OTHER HYDROCARBON SUBSTANCES AND ALL GEOTHERMAL ENERGY SOURCES IN OR UNDER OR WHICH MAY BE PRODUCED FROM THE WITHIN-DESCRIBED LAND WHICH LIE BELOW A PLANE PARALLEL TO AND FIVE HUNDRED (500) FEET BELOW THE SURFACE OF THE WITHIN-DESCRIBED LAND, FOR THE PURPOSE OF PROSPECTING, EXPLORATION, DEVELOPMENT, PRODUCTION, OR EXTRACTION OF SAID SUBSTANCES BY MEANS OF MINES, WELLS, DERRICKS, AND/OR OTHER EQUIPMENT; PROVIDED, HOWEVER, THAT THE OWNER OF SAID SUBSTANCES SHALL HAVE NO RIGHT TO ENTER THE SURFACE OF THE WITHIN-DESCRIBED LAND NOR TO USE SAID LAND ABOVE SAID PLANE PARALLEL TO AND FIVE HUNDRED (500) FEET BELOW THE SURFACE OF SUCH LAND.

This conveyance is made in compliance with the terms and provisions of the Deed of Trust executed by MARK RICHARD DION, AND LISA LYNN DION, TRUSTEES OF THE DION FAMILY TRUST DATED DECEMBER 4TH 1998 as Trustor, dated 6/12/2009 of the Official Records in the office of the Recorder of Clark, Nevada under the authority and powers vested in the Trustee designated in the Deed of Trust or as the duly appointed Trustee, default having occurred under the Deed of Trust pursuant to the Notice of Breach and Election to

TRUSTEE'S DEED UPON SALE

T.S. #: 090044-NV

Loan #: *****0514

Order #: 191315360-NV-V01

Sell under the Deed of Trust recorded on 6/23/2009, as Instrument No. 20090623-0003917 of official records. Trustee having complied with all applicable statutory requirements of the State of Nevada and performed all duties required by the Deed of Trust including sending a Notice of Breach and Election to Sell within ten days after its recording and a Notice of Sale at least twenty days prior to the Sale Date by certified return receipt mail, postage pre-paid to each person entitled to notice in compliance with Nevada Revised Statutes 107.080

All requirements per Nevada Statutes regarding the mailing, personal delivery and publication of copies of Notice of Default and Election to Sell under Deed of Trust and Notice of Trustee's Sale, and the posting of copies of Notice of Trustee's Sale have been complied with. Trustee, in compliance with said Notice of Trustee's sale and in exercise of its powers under said Deed of Trust sold said real property at public auction on 3/24/2021. Grantee, being the highest bidder at said sale became the purchaser of said property for the amount bid, being \$ 5452,000.00, in lawful money of the United States, or by the satisfaction, pro tanto of the obligation then secured by said Deed of Trust.

In witness thereof, CLEAR RECON CORP, as Trustee, has this day, caused its name to be hereunto affixed by its officer thereunto duly authorized by its corporation by-laws

Date: MAR 30 2021

CLEAR RECON CORP



Monica Chavez
Authorized Signor

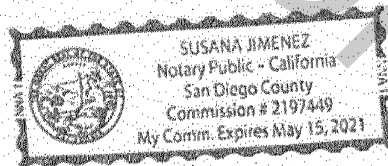
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California} ss
County of San Diego}

On MAR 30 2021 before me Susana Jimenez Notary Public, personally appeared Monica Chavez who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument. I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature Susana Jimenez (Seal)



**STATE OF NEVADA
DECLARATION OF VALUE**

1. Assessor Parcel Number(s)

a. 179-31-212-022

b. _____

c. _____

d. _____

2. Type of Property:

- | | |
|--|---|
| a. <input type="checkbox"/> Vacant Land | b. <input checked="" type="checkbox"/> Single Fam. Res. |
| c. <input type="checkbox"/> Condo/Twnhse | d. <input type="checkbox"/> 2-4 Plex |
| e. <input type="checkbox"/> Apt. Bldg | f. <input type="checkbox"/> Comm'l/Ind'l |
| g. <input type="checkbox"/> Agricultural | h. <input type="checkbox"/> Mobile Home |
| Other _____ | |

FOR RECORDERS OPTIONAL USE ONLY

Book _____ Page: _____

Date of Recording: _____

Notes: _____

3.a. Total Value/Sales Price of Property

\$ 452,000.00

b. Deed in Lieu of Foreclosure Only (value of property (_____)

c. Transfer Tax Value: \$ 452,000.00

d. Real Property Transfer Tax Due \$ 2,305.20

4. **If Exemption Claimed:**

a. Transfer Tax Exemption per NRS 375.090, Section _____

b. Explain Reason for Exemption: _____

5. Partial Interest: Percentage being transferred: _____ %

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month. Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature _____

Capacity: lawyer

Signature _____

Capacity: _____

SELLER (GRANTOR) INFORMATION
(REQUIRED)

Print Name: Clear Recon Corp.

Address: 4375 Jutland Drive, Suite 200

City: San Diego

State: CA

Zip: 92117

BUYER (GRANTEE) INFORMATION
(REQUIRED)

Print Name: Sanam Limited

Address: 34 Sandwedge Drive

City: Henderson

State: NV

Zip: 89074

COMPANY/PERSON REQUESTING RECORDING (Required if not seller or buyer)

Print Name: Andrew Pastwick

Escrow # _____

Address: 1810 E. Sahara Ave., Suite 120

City: Las Vegas

State: NV

Zip: 89104

AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED

Exhibit A – Recorded Lis Pendens for 176 Glen Falls Ave.

Exhibit A – Recorded Lis Pendens for 176 Glen Falls Ave.

List #: 20220712-0002078

Fees: \$42.00

07/12/2022 02:45:13 PM

Receipt #: 5052303

Requestor:

UNITED STATES ATTORNEYS O

Recorded By: SCHIABLE Pgs: 4

Debbie Conway

CLARK COUNTY RECORDER

Src: FRONT COUNTER

Ofc: MAIN OFFICE

RECORDING COVER PAGE

(Must be typed or printed clearly in BLACK ink only
and avoid printing in the 1" margins of document)

APN# 179-31-212-022

(11 digit Assessor's Parcel Number may be obtained at:

<http://redrock.co.clark.nv.us/assrealprop/owner.aspx>)

TITLE OF DOCUMENT

(DO NOT Abbreviate)

Lis Pendens

Document Title on cover page must appear EXACTLY as the first page of the document
to be recorded.

RECORDING REQUESTED BY:United States Attorney's Office District of NevadaRETURN TO: Name Anette LeeAddress 110 N City PkwyCity/State/Zip Las Vegas, NV 89106**MAIL TAX STATEMENT TO: (Applicable to documents transferring real property)**

Name _____

Address _____

City/State/Zip _____

This page provides additional information required by NRS 111.312 Sections 1-2.

To print this document properly, do not use page scaling.

P:\Common\Forms & Notices\Cover Page Template Oct2017

1 JASON M. FRIERSON
 2 United States Attorney
 Nevada Bar Number 7709
 ERIC SCHMALE
 3 Assistant United States Attorney
 501 Las Vegas Boulevard South, Suite 1100
 4 Las Vegas, Nevada 89101
 Telephone: (702) 388-6336
 5 Email: eric.schmale@usdoj.gov

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
JUL 12 2022	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY

6 DEBORAH CONNOR
 Chief, Money Laundering and Asset Recovery Section
 7 Criminal Division, U.S. Department of Justice
 D. ZACHARY ADAMS
 8 Trial Attorney
 1400 New York Ave NW
 9 Washington, D.C. 20005
 Telephone: (202) 514-1263
 10 Email: david.zachary.adams@usdoj.gov

11 *Attorneys for the United States*

12
 13 UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

14 UNITED STATES OF AMERICA,

2:22-CR-142-RFB-DJA

15 Plaintiff,

Lis Pendens

16 v.

17 MEELAD DEZFOOLI,

18 Defendant.

19 176 GLEN FALLS AVENUE,
 HENDERSON, NEVADA, 89002,
 20 MORE PARTICULARLY
 DESCRIBED AS:

21 LOT 17 IN BLOCK "C" OF PARADISE
 22 HILLS NO. 16, AS SHOWN BY MAP
 THEREOF ON FILE IN BOOK 97 OF
 23 PLATS, PAGE 8 IN THE OFFICE OF
 THE COUNTY RECORDER OF CLARK
 24 COUNTY, NEVADA, EXCEPTING
 THERFROM ALL MINERALS, OIL,
 25 GAS, PETROLEUM, OTHER
 HYDROCARBON SUBSTANCES AND
 26 ALL GEOTHERMAL ENERGY
 SOURCES IN OR UNDER OR WHICH
 27 MAY BE PRODUCED FROM THE
 WITHIN-DESCRIBED LAND WHICH
 28 LIE BELOW A PLANE PARALLEL TO
 AND FIVE HUNDRED (500) FEET

1 BELOW THE SURFACE OF THE
2 WITHIN-DESCRIBED LAND, FOR THE
3 PURPOSE OF PROSPECTING,
4 EXPLORATION, DEVELOPMENT,
5 PRODUCTION, OR EXTRACTION OF
6 SAID SUBSTANCES BY MEANS OF
7 MINES, WELLS, DERRICKS, AND/OR
8 OTHER EQUIPMENT: PROVIDED,
9 HOWEVER, THAT THE OWNER OF
10 SAID SUBSTANCES SHALL HAVE
11 THE RIGHT TO ENTER THE
12 SURFACE OF THE WITHIN-
13 DESCRIBED LAND NOR TO USE SAID
14 LAND ABOVE SAID PLANE
15 PARALLEL TO AND FIVE HUNDRED
16 (500) FEET BELOW THE SURFACE OF
17 SUCH LAND; TOGETHER WITH ALL
18 IMPROVEMENTS AND
19 APPURTENANCES THEREON, APN:
20 179-31-212-022.

21 NOTICE IS HEREBY GIVEN that an action has been commenced in the above-
22 entitled Court on Criminal Indictment of the United States of America to secure the judicial
23 forfeiture of the real property known as 176 Glen Falls Avenue, Henderson, Nevada, 89002,
24 more particularly described as:

25 LOT 17 IN BLOCK "C" OF PARADISE HILLS NO. 16, AS SHOWN BY
26 MAP THEREOF ON FILE IN BOOK 97 OF PLATS, PAGE 8 IN THE
27 OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY,
28 NEVADA, EXCEPTING THERFROM ALL MINERALS, OIL, GAS,
PETROLEUM, OTHER HYDROCARBON SUBSTANCES AND ALL
GEOTHERMAL ENERGY SOURCES IN OR UNDER OR WHICH
MAY BE PRODUCED FROM THE WITHIN-DESCRIBED LAND
WHICH LIE BELOW A PLANE PARALLEL TO AND FIVE HUNDRED
(500) FEET BELOW THE SURFACE OF THE WITHIN-DESCRIBED
LAND, FOR THE PURPOSE OF PROSPECTING, EXPLORATION,
DEVELOPMENT, PRODUCTION, OR EXTRACTION OF SAID
SUBSTANCES BY MEANS OF MINES, WELLS, DERRICKS, AND/OR
OTHER EQUIPMENT: PROVIDED, HOWEVER, THAT THE OWNER
OF SAID SUBSTANCES SHALL HAVE THE RIGHT TO ENTER THE
SURFACE OF THE WITHIN-DESCRIBED LAND NOR TO USE SAID
LAND ABOVE SAID PLANE PARALLEL TO AND FIVE HUNDRED
(500) FEET BELOW THE SURFACE OF SUCH LAND; TOGETHER
WITH ALL IMPROVEMENTS AND APPURTENANCES THEREON,
APN: 179-31-212-022.

///

///


///

1 to the United States of America under 18 U.S.C. § 981(a)(1)(A) with 28 U.S.C. § 2461(c), 18
2 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c), 18 U.S.C. § 982(a)(1), and 18 U.S.C. §
3 982(a)(2)(A) for violations of 18 U.S.C. §§ 1344, 1956(a)(1)(B)(i), and 1957.

4 Dated: July __, 2022.

5 Respectfully submitted,

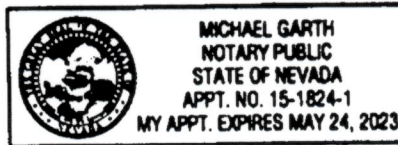
6 JASON M. FRIERSON
7 United States Attorney

8 
9 D. ZACHARY ADAMS
Trial Attorney

10 STATE OF NEVADA }
11 COUNTY OF CLARK } ss

12 On this 12 day of July, 2022, D. ZACHARY ADAMS, a person
13 personally known to me or proven to me by satisfactory evidence, appeared before
14 me, a Notary Public, and executed the foregoing Lis Pendens in my presence.

15 
16 NOTARY PUBLIC



17
18
19
20
21 I hereby attest and certify on 7/12/22
22 that the foregoing document is a full, true
23 and correct copy of the original on file in my
24 legal custody.

25 CLERK, U.S. DISTRICT COURT
26 DISTRICT OF NEVADA

27 By J. Maguire Deputy Clerk



1 Exhibit B – Recorded Request for Notice for 176 Glen Falls Ave.
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28 Exhibit B – Recorded Request for Notice for 176 Glen Falls Ave.

Inst #: 20221201-0001658

Fees: \$42.00

12/01/2022 01:42:07 PM

Receipt #: 5170062

Requestor:

US Attorneys Office NV

Recorded By: DROY Pgs: 3

Debbie Conway

CLARK COUNTY RECORDER

Src: ERECORD

Ofc: ERECORD

RECORDING COVER PAGE

(Must be typed or printed clearly in BLACK ink only
and avoid printing in the 1" margins of document)

APN# 179-31-212-022

(11 digit Assessor's Parcel Number may be obtained at:
<http://redrock.co.clark.nv.us/assrrealprop/ownr.aspx>)

TITLE OF DOCUMENT

(DO NOT Abbreviate)

Request for Notice

Document Title on cover page must appear EXACTLY as the first page of the document
to be recorded.

RECORDING REQUESTED BY:

Daniel Hollingsworth

RETURN TO: Name Daniel Hollingsworth, Assistant United States Atty

Address 501 Las Vegas Blvd, South

City/State/Zip Las Vegas, NV 89101

MAIL TAX STATEMENT TO: (Applicable to documents transferring real property)

Name

Address

City/State/Zip

This page provides additional information required by NRS 111.312 Sections 1-2.

An additional recording fee of \$1.00 will apply.

To print this document properly, do not use page scaling.

Using this cover page does not exclude the document from assessing a noncompliance fee.

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WHEN RECORDED MAIL TO:

United States Attorney's Office
Daniel D. Hollingsworth
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, NV 89101

SEND TAX STATEMENT TO:

United States Attorney's Office
Daniel D. Hollingsworth
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, NV 89101

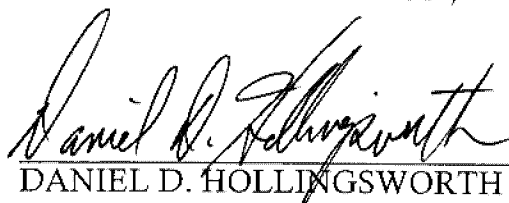
APN # 179-31-212-022

REQUEST FOR NOTICE
Under Chapter 107 NRS

In accordance with NRS 107.090, request is hereby made that a copy of any Notice of Default and a copy of any Notice of Sale under the Trustee's Deed Upon Sale recorded as Document Instrument Number 20211008-0000039 on October 8, 2021, between Clear Recon Corp., as Trustee (Grantor), and Sanam Limited (Grantee), of Official Records of Clark County, Nevada, and describing land therein as:


176 GLEN FALLS AVENUE, HENDERSON, NEVADA, 89002, MORE PARTICULARLY DESCRIBED AS:

LOT 17 IN BLOCK "C" OF PARADISE HILLS NO. 16, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 97 OF PLATS, PAGE 8 IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA. EXCEPTING THEREFROM ALL MINERALS, OIL, GAS, PETROLEUM, OTHER HYDROCARBON SUBSTANCES AND ALL GEOTHERMAL ENERGY SOURCES IN OR UNDER OR WHICH MAY BE PRODUCED FROM THE WITHIN-DESCRIBED LAND WHICH LIE BELOW A PLANE PARALLEL TO AND FIVE HUNDRED (500) FEET BELOW THE SURFACE OF THE WITHIN-DESCRIBED LAND, FOR THE PURPOSE OF PROSPECTING, EXPLORATION, DEVELOPMENT, PRODUCTION, OR EXTRACTION OF SAID SUBSTANCES BY MEANS OF MINES, WELLS, DERRICKS, AND/OR OTHER EQUIPMENT; PROVIDED, HOWEVER, THAT THE OWNER OF SAID SUBSTANCES SHALL HAVE NO RIGHT TO ENTER THE SURFACE OF THE WITHIN-DESCRIBED LAND NOR TO USE SAID LAND ABOVE SAID PLANE PARALLEL TO AND FIVE HUNDRED (500) FEET BELOW THE SURFACE OF SUCH LAND; TOGETHER WITH ALL IMPROVEMENTS AND APPURTENANCES THEREON,
APN: 179-31-212-022.

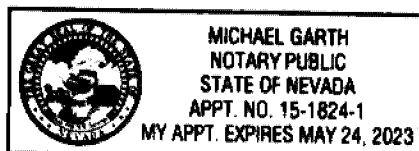

DANIEL D. HOLLINGSWORTH

STATE OF NEVADA)
) ss
COUNTY OF CLARK)

On December 1, 2022, before me, the undersigned, a Notary Public in and for said County and State, personally appeared Daniel D. Hollingsworth known to me to be the person described in and who executed the foregoing instrument, who acknowledged to me that he executed the same freely and voluntarily and for the uses and purposes therein mentioned.



Notary Public



1 Exhibit C – Clark County Recorder, Property Search for 176 Glen Falls Ave.
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28 Exhibit C – Clark County Recorder, Property Search for 176 Glen Falls Ave.

Search Criteria - ParcelNumber: 179-31-212-022, Filter: StartsWith, From Date: 3/1/2021, To Date: 8/20/2024, Doc Type: All

Parcel #	First Party Name	First Cross Party Name	# Pages	Instrument#	Document Type	Modifier	Record Date	Legal Description	Total Value
179-31-212-022	SANAM LIMITED	REPUBLIC SILVER STATE DISPOSAL INC	1	202407250002273	LIEN		07/25/2024		\$0.00
179-31-212-022	SANAM LIMITED	PARADISE HILLS LANDSCAPE MAINTENANCE ASSOCIATION INC	2	202407150001613	DEFAULT		07/15/2024		\$0.00
179-31-212-022	SANAM LIMITED	PARADISE HILLS LANDSCAPE MAINTENANCE ASSOCIATION INC	1	202405310000574	LIEN		05/31/2024		\$0.00
179-31-212-022	SANAM LIMITED	REPUBLIC SILVER STATE DISPOSAL INC	1	202401310004267	LIEN		01/31/2024		\$0.00
179-31-212-022	SANAM LIMITED	REPUBLIC SILVER STATE DISPOSAL INC	1	202307200003441	LIEN		07/20/2023		\$0.00
179-31-212-022	SANAM LIMITED	REPUBLIC SILVER STATE DISPOSAL INC	1	202301110003325	LIEN		01/11/2023		\$0.00
179-31-212-022	SANAM LIMITED	TREASURER CLARK COUNTY	1	202301030000869	TAX CERTIFICATE		01/03/2023		\$0.00
179-31-212-022	CLEAR RECON CORP EE	ATTORNEY UNITED STATES		202212010001658	REQUEST NOTICE		12/01/2022		\$0.00
179-31-212-022	DEZFOOLI, MEELAD	UNITED STATES OF AMERICA	4	202207120002078	LIS PENDENS		07/12/2022		\$0.00
179-31-212-022	SANAM LIMITED	REPUBLIC SILVER STATE DISPOSAL INC	1	202205310003223	LIEN		05/31/2022		\$0.00
179-31-212-022	CLEAR RECON CORP	SANAM LIMITED	3	202110080000039	TRUSTEE DEED		10/08/2021		\$452,000.00
179-31-212-022	MTGLOQ INVESTORS LP	REPUBLIC SILVER STATE DISPOSAL INC	1	202106290000728	LIEN		06/29/2021		\$0.00

1 Exhibit D – Clark County Treasurer, Property Account Inquiry for 176 Glen Falls Ave.

28 Exhibit D – Clark County Treasurer, Property Account Inquiry for 176 Glen Falls Ave.

Property Account Inquiry - Summary Screen

New Search

Parcel ID	179-31-212-022	Tax Year	2025	District	505	Rate	2.9604
Situs Address:	176 GLEN FALLS AVE HENDERSON						
Legal Description:	ASSESSOR DESCRIPTION: PARADISE HILLS #16 PLAT BOOK 97 PAGE 8 LOT 17 BLOCK CGEOID: PT S2 NW4 SEC 31 22 63						

Status:	Property Characteristics		Property Values		Property Documents	
Active	Tax Cap Increase Pct.	8.0	Land	32550	2021100800039	10/8/2021
Taxable	Tax Cap Limit Amount	3706.95	Improvements	127338	2017051003726	5/10/2017
Delinquent	Tax Cap Reduction	1026.37	Total Assessed Value	159888	01120301925	12/3/2001
	Land Use	1-10 Single Family Residential	Net Assessed Value	159888		
	Cap Type	OTHER	Exemption Value New Construction	0		
	Acreage	0.1400	New Construction - Supp Value	0		
	Exemption Amount	0.00				

Role	Name	Address	Since	To
Owner	SANAM LIMITED	C/O TRUSTEE CLARK COUNTY TREASURER 34 SANDWEDGE DR , HENDERSON, NV 89074 UNITED STATES	8/9/2024	Current

Summary

Item	Amount
Taxes as Assessed	\$4,733.32
Less Cap Reduction	\$1,026.37
Net Taxes	\$3,706.95

PAST AND CURRENT CHARGES DUE TODAY

Tax Year	Charge Category	Amount Due Today
2025	Property Tax Principal	\$926.73
2025	Las Vegas Artesian Basin	\$2.60
2024	Property Tax Principal	\$3,432.36
2024	Las Vegas Artesian Basin	\$3.03
2024	Property Tax Penalty	\$515.53
2024	Property Tax Interest	\$272.06
2024	Advertising Fee	\$10.00
2024	MAILING FEE	\$32.00
2023	Property Tax Principal	\$3,178.11
2023	City of Henderson Abatement	\$650.00
2023	Las Vegas Artesian Basin	\$3.08
2023	Property Tax Penalty	\$620.40
2023	Property Tax Interest	\$705.46
2023	Advertising Fee	\$7.00
2023	MAILING FEE	\$2.00
2022	Property Tax Principal	\$2,942.69
2022	Las Vegas Artesian Basin	\$3.06
2022	Property Tax Penalty	\$442.07
2022	Property Tax Interest	\$822.44
2022	Advertising Fee	\$7.00
2022	MAILING FEE	\$2.00
CURRENT AMOUNTS DUE as of 8/20/2024		\$14,579.62

NEXT INSTALLMENT AMOUNTS

Tax Year	Charge Category	Installment Amount Due
2025	Property Tax Principal	\$926.74
NEXT INSTALLMENT DUE AMOUNT due on 10/7/2024		\$926.74

TOTAL AMOUNTS DUE FOR ENTIRE TAX YEAR

Tax Year	Charge Category	Remaining Balance Due
2025	Property Tax Principal	\$3,706.95
2025	Las Vegas Artesian Basin	\$2.60
2024	Property Tax Principal	\$3,432.36
2024	Las Vegas Artesian Basin	\$3.03
2024	Property Tax Penalty	\$515.53
2024	Property Tax Interest	\$272.06
2024	Advertising Fee	\$10.00
2024	MAILING FEE	\$32.00
2023	Property Tax Principal	\$3,178.11
2023	City of Henderson Abatement	\$650.00
2023	Las Vegas Artesian Basin	\$3.08
2023	Property Tax Penalty	\$620.40
2023	Property Tax Interest	\$705.46
2023	Advertising Fee	\$7.00
2023	MAILING FEE	\$2.00
2022	Property Tax Principal	\$2,942.69
2022	Las Vegas Artesian Basin	\$3.06
2022	Property Tax Penalty	\$442.07
2022	Property Tax Interest	\$822.44
2022	Advertising Fee	\$7.00
2022	MAILING FEE	\$2.00
TAX YEAR TOTAL AMOUNTS DUE as of 8/20/2024		\$17,359.84

PAYMENT HISTORY

Last Payment Amount	\$683.08
Last Payment Date	3/2/2021
Fiscal Tax Year Payments	\$0.00
Prior Calendar Year Payments	\$0.00
Current Calendar Year Payments	\$0.00

1 Exhibit E – Paradise Hills HOA Notice of Default and Election to Sell 176 Glen Falls Ave.

28 Exhibit E – Paradise Hills HOA Notice of Default and Election to Sell 176 Glen Falls Ave.



9314 8100 1170 1173 4370 85

July 17, 2024

VIA CERTIFIED AND FIRST CLASS MAIL

UNITED STATES ATTORNEY'S OFFICE
DANIEL D HOLLINGSWORTH
501 LAS VEGAS BLVD SOUTH STE 1100
LAS VEGAS, NV 89101

Re: 176 Glen Falls Ave, Henderson, NV 89002
Paradise Hills Landscape Maintenance Association, Inc. / R844781

Dear UNITED STATES ATTORNEY'S OFFICE ,

Red Rock Financial Services is a debt collector and is attempting to collect a debt. Any information obtained will be used for that purpose.

Enclosed, please find a copy of the ***Notice of Default and Election to Sell***. This notice is being sent to any parties that may have an interest in the property.

Please contact Red Rock Financial Services to obtain an up to date account balance. All Payments must be in the form of a cashier's check or money order. Please ensure the account number is listed on any payments remitted to our office. If we receive partial payments, they will be credited to the account, however, we will continue with the collection process on the balance owed as described above.

Regards,

Red Rock Financial Services



702.932.6887

770 E. Warm Springs Road Suite 320, Las Vegas, Nevada 89119

By sending your check, please be aware that you are authorizing Red Rock Financial Services to use the information on your check to make a one-time electronic debit from your account at the financial institution indicated on your check. This electronic debit will be for the amount of your check; no additional amount will be added to the amount. (If we cannot collect your electronic payment, we will issue a draft against your account.) Please contact the Accounts Receivable department at (702) 932-6887 to learn about other payment options should you prefer to not have your payment processed in this manner.

Assessor Parcel Number: 179-31-212-022
File Number: R844781
Property Address: 176 Glen Falls Ave
Henderson, NV 89002
Title Order Number:

Inst #: 20240715-0001613
Fees: \$42.00
07/15/2024 03:36:41 PM
Receipt #: 5634227
Requestor:
American Lot Book
Recorded By: JTMCD Pgs: 2
Debbie Conway
CLARK COUNTY RECORDER
Src: ERECORD
Ofc: ERECORD

NOTICE OF DEFAULT AND ELECTION TO SELL PURSUANT TO THE
LIEN FOR DELINQUENT ASSESSMENTS
◆ IMPORTANT NOTICE ◆

**WARNING! IF YOU FAIL TO PAY THE AMOUNT
SPECIFIED IN THIS NOTICE, YOU COULD LOSE YOUR
HOME, EVEN IF THE AMOUNT IS IN DISPUTE!**

NOTICE IS HEREBY GIVEN: Red Rock Financial Services, officially assigned as agent by the Paradise Hills Landscape Maintenance Association, Inc. (the "Association"), under the Lien for Delinquent Assessments, recorded on 05/31/2024, in Book Number 20240531, as Instrument Number 0000574, reflecting SANAM LIMITED as the owner(s) of record on said lien, land legally described as PARADISE HILLS #16 PLAT BOOK 97 PAGE 8 LOT 17 BLOCK C, of the Official Records in the Office of the Recorder of Clark County, Nevada, makes known the obligation under the Covenants, Conditions and Restrictions recorded 01/11/1996, in Book Number 19960111, as Instrument Number 0000563 (the "CC&Rs"), has been breached. As of 07/01/2023 forward, all assessments, whether monthly or otherwise, late fees, interest, Association charges, legal fees, collection fees and costs, and fines for violations posing an imminent threat of causing a substantial adverse effect on the health, safety or welfare of the owners of 176 Glen Falls Ave or the Association's residents, less any credits, have not been satisfied.

The Association has equipped Red Rock Financial Services with verification of the underlying obligation according to the CC&Rs in addition to documents proving the debt, therefore declaring any and all amounts secured as well as due and payable, electing the property to be sold to satisfy the obligation. In accordance with Chapter 116 of the Nevada Revised Statutes, no sale date may be set until the ninety-first (91st) day after the recorded date and the mailing date of the Notice of Default and Election to Sell. As of July 9, 2024, the amount owed is \$2,903.96. This amount will continue to increase until paid in full.

The amount of the Association's lien that is prior to the first security interest on the unit pursuant to subsection 3 of NRS 116.3116 as of the date of this notice is \$1,510.44 (the "Superpriority Amount"). Of the Superpriority Amount, and as of the date of this notice, \$130.44 is attributable to assessments based on the periodic budget adopted by the Association pursuant to NRS 116.3115, and \$1,380.00 is attributable to the costs of enforcing the Association's lien.

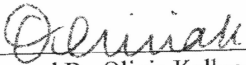
If the holder of the first security interest on the unit does not satisfy the amount of the Association's lien that is prior to that first security interest pursuant to subsection 3 of NRS 116.3116, the association may foreclose its lien by sale and that the sale may extinguish the first security interest as



Assessor Parcel Number: 179-31-212-022
File Number: R844781
Property Address: 176 Glen Falls Ave
Henderson, NV 89002
Title Order Number:

to the unit. If, not later than 5 days before the date of the sale, the holder of the first security interest in the unit satisfies the amount of the Association's lien that is prior to the first security interest pursuant to subsection 3 of NRS 116.3116 and, not later than 2 days before the date of sale, a record of such satisfaction is recorded in the office of the recorder of the county in which the unit is located, the Association may foreclose its lien by sale but the sale may not extinguish the first security interest as to the unit.

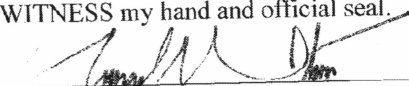
Dated: July 9, 2024

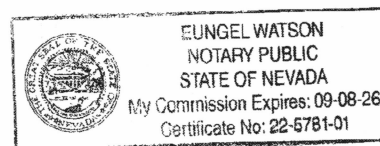

Prepared By Olivia Kellogg as agent of Red Rock Financial Services on behalf of Paradise Hills
Landscape Maintenance Association, Inc.

STATE OF NEVADA)
COUNTY OF CLARK)

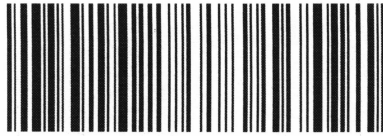
On July 9, 2024, before me, personally appeared Olivia Kellogg, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.


When Recorded Red Rock Financial Services
Mail To: 770 E. Warm Springs Road Suite 320
Las Vegas, Nevada 89119
702-932-6887



Red Rock Financial Services
PO Box 9088
Temecula, CA 92589-9088



PRESORT
First-Class Mail
U.S. Postage and
Fees Paid
WSO

Send Payments to:
Red Rock Financial Services
770 E. Warm Springs Road
Suite 320
Las Vegas, NV 89119

RETURN RECEIPT (ELECTRONIC)

20240717-117



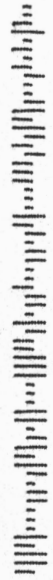
Send Correspondence to:
Red Rock Financial Services
770 E. Warm Springs Road
Suite 320
Las Vegas, NV 89119

UNITED STATES ATTORNEY'S OFFICE
501 LAS VEGAS BLVD SOUTH STE 1100
LAS VEGAS, NV 89101



CERTIFIED MAIL®

RECEIVED
2024 JUL 22 PM 2:38
U.S. ATTORNEY'S OFFICE
LAS VEGAS, NV



1E FYR-IP1 89101